

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
Tampa Division

CASE NO. 97-2374 Civ-T23-C

AMADO NAVAS,

Plaintiff,

v.

LUCENT TECHNOLOGIES INC.,  
*et al.*,

Defendants.

**ANTHONY SAVASTANO'S NOTICE OF SERVING ANSWERS AND OBJECTIONS TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES SERVED ON JUNE 15, 1998**

Defendant, ANTHONY SAVASTANO (hereinafter referred to as "Savastano"), by and through his undersigned counsel, and pursuant to Rule 33, Fed. R. Civ. P., hereby serves his Answers and Objections to Plaintiff's First Set of Interrogatories served on or about June 15, 1998, by delivering the original of said Answers via U.S. Mail to: Stephanie Alexander, Esq., Nolan & Alexander, 2450 Hollywood Blvd. Suite 702, Hollywood, Florida, 33020 this 15<sup>th</sup> day of July, 1998.

Respectfully submitted,

WALLACE, BAUMAN, LEGON,  
FODIMAN & SHANNON, P.A.  
Attorneys for Savastano  
2222 Ponce de Leon Blvd. - Suite 600  
Coral Gables, Florida 33134  
(305) 444-9991

BY: 

TODD R. LEGON  
Florida Bar No.: 814415

This form is affected by the Privacy Act of 1974, See Privacy Act Statement before completing this form.

☒ EEOC 150972617

Florida Comm. on Human Relations

State or local Agency, if any

and EEOC

NAME (Indicate Mr., Mrs., Mss.)

Mr. Handi H. Elsieh

HOME TELEPHONE (Include Area Code)

(954) 255-9882

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

8825 Ramblewood Drive, Apartment 1502, Coral Springs, FL 33071

02/11/64

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

Lucent Technologies, Inc.

Cat A (15-100)

(908) 582-8509

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

8548 126th Avenue N, Largo, FL 34649

103

NAME

TELEPHONE NUMBER (Include Area Code)

Lucent Technologies

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

Fort Lauderdale, Florida

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☒ RACE ☒ COLOR ☐ SEX ☒ RELIGION ☒ NATIONAL ORIGIN  
☐ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE  
EARLIEST LATEST

01/23/97 04/21/97

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

1. Since January 23, 1997 I have been subjected to a hostile work environment. I was subjected to racial comments by Lucent management personnel consistent with an E-mail message from Mike Reed to Bruce Brewer, a copy of which is attached hereto as Exhibit A. On April 21, 1997 I was demoted and constructively discharged from my position as Manager of the Respondent's Fort Lauderdale group. I am a Black Egyptian of Muslim decent.

2. Mr. Bruce Brewer, White, B-Band Manager and Lew Kaslow, White, C-Band Manager gave no reason for their harassment or intimidation. Mr. David Ward, White, Manager replaced me and then demoted me. Mr. Ward also told me that I did not have a future with the Respondent. Mr. Ward gave me the name of a Head Hunter.

3. I believe I have been discriminated against based on my national origin, race, color, and religion in violation of Title VII of the Civil Rights Act of 1964, as amended.

☐ I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(Day, month, and year)

Date

Charging Party (Signature)